

Deverie J. Christensen  
Nevada State Bar No. 6596  
Holly E. Walker  
Nevada State Bar No. 14295  
**JACKSON LEWIS P.C.**  
300 South Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
Email: [deverie.christensen@jacksonlewis.com](mailto:deverie.christensen@jacksonlewis.com)  
[holly.walker@jacksonlewis.com](mailto:holly.walker@jacksonlewis.com)

*Attorneys for Defendant  
Southwest Medical Associates, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MARGUERITE BRATHWAITE, M.D., an  
individual,

Plaintiff,

vs.

SOUTHWEST MEDICAL ASSOCIATES,  
INC., an active Nevada domestic Corporation;  
DOES 1-10 and ROE ENTITIES 1-10,  
inclusive,

Defendants.

Case No. 2:22-cv-00729-JCM-NJK

**STIPULATION TO EXTEND  
DEADLINE FOR DEFENDANT TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT [ECF No. 1]**

**(SECOND REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Marguerite Brathwaite, M.D. ("Plaintiff"), through her counsel F. Travis Buchanan, Esq., & Assoc., PLLC, and Defendant Southwest Medical Associates, Inc. ("Defendant"), through its counsel Jackson Lewis P.C., that Defendant shall have an extension, up to and including Wednesday, September 21, 2022, in which to file a response to Plaintiff's Complaint (ECF No. 1). This Stipulation is submitted and based upon the following:

1. On August 10, 2022, the Court entered an Order granting the parties' request for an extension of time for Defendant to file a response to the Complaint to allow Defense Counsel sufficient time to investigate the allegations of the Complaint. ECF No. 9.

2. Defendant's response to the Complaint is currently due on September 14, 2022. ECF No. 9.

3. This is the second request for an extension of time for Defendant to file a response to Plaintiff's Complaint.

4. Lead Defense Counsel has recently been out of the office due to medical issues. On August 11, 2022, she underwent surgery for a medical condition. She has been recovering from this surgery, which resulted in a complication, and from the flu.

5. Given these issues, additional time is required to file a response to the Complaint. The parties have agreed to allow Defendant a brief extension of one week, up to and including Wednesday, September 21, 2022, in which to file a response to the Complaint.

6. This request is made in good faith and not for the purpose of delay.

7. Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or be construed as waiving any claim or defense held by any party hereto.

Dated this 12th day of September, 2022.

F. TRAVIS BUCHANAN, ESQ., & ASSOC., JACKSON LEWIS P.C.  
PLLC

/s/ F. Travis Buchanan  
F. Travis Buchanan, Bar No. 9371  
701 East Bridger Ave., Suite 540  
Las Vegas, Nevada 89101

*Attorneys for Plaintiff  
Marguerite Brathwaite, M.D.*

/s/ Holly E. Walker  
Deverie J. Christensen, Bar No. 6596  
Holly E. Walker, Bar No. 14295  
300 S. Fourth Street, Ste. 900  
Las Vegas, Nevada 89101

*Attorneys for Defendant  
Southwest Medical Associates, Inc.*

**ORDER**

IT IS SO ORDERED:

  
United States ~~District Court~~ Magistrate Judge

Dated: September 13, 2022